

EXHIBIT “A”

CELLINO LAW LLP
420 Lexington Avenue, Suite 830
New York, New York 10170
800-555-5555
Attorneys for Plaintiff

GUY EDWARD MOORE

Plaintiff(s),

v.

FEDERAL EXPRESS
CORPORATION also known as
FedEx Corporation
JEAN-PAUL BENNETT, ABC
COMPANIES1-10 said entity names
being fictitious and JOHN DOES 1-
10 said names being fictitious
Defendant(s),

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION: ESSEX COUNTY

DOCKET NO.: ESX-L- **002559-22**

CIVIL ACTION

SUMMONS

THE STATE OF NEW JERSEY, TO THE ABOVE NAMED DEFENDANT:

The Plaintiff named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and Proof of Service with the Deputy Clerk of the Superior Court in the County listed above within thirty (35) days from the date you received this Summons not counting the date you received it. The Address of each Deputy Clerk of the Superior Court is provided. If the Complaint is one of foreclosure, then you must file your written Answer or Motion and Proof of Service with the clerk of the Superior Court, **Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971**. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement, available from the Deputy Clerk of the Superior Court, must accompany your Answer or Motion

when it is filed. You must also send a copy of your Answer or Motion to Plaintiff's attorney whose name and address appear above, or to the Plaintiff if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written Answer or Motion, with a fee of \$175.00 and completed Case Information Statement, if you want the Court to hear your defense.

If you do not file and serve a written Answer or Motion within thirty-five (35) days, the Court may enter a judgment against you for the relief Plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford to pay an attorney, you may call the Legal Services Office in the County where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A List of these number is also provided.

Dated: April 29, 2022

CELLINO LAW LLP

John H. Shields

MICHELLE M. SMITH

Clerk Superior Court

Name of Defendants to be served:

FEDERAL EXPRESS CORPORATION
also known as FedEx Corporation
C/O C T CORPORATION SYSTEM
820 BEAR TAVERN ROAD
WEST TRENTON, NJ 08628

JEAN-PAUL BENNETTE
9762 Clifwood Ter
Tobyhanna, PA 18466

CELLINO LAW LLP
John H. Shields (036821983)
420 Lexington Avenue, Suite 830
New York, New York 10170
Attorney for Plaintiff

GUY EDWARD MOORE.

Plaintiff

-VS-

FEDERAL EXPRESS CORPORATION
also known as FedEx Corporation
JEAN-PAUL BENNETT, ABC COMPANIES
1-10 said entity names being fictitious and
JOHN DOES 1-10 said names being fictitious

Defendants.

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION: ESSEX COUNTY

DOCKET NO.:

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff(s), GUY EDWARD MOORE, by way of Complaint, states, upon information and belief, as follows:

1. At all times hereinafter mentioned, defendant FEDERAL EXPRESS CORPORATION also known as FedEx Corporation is a corporation conducting business in New Jersey with a principal place of business in Newark, New Jersey.

2. That at all times herein relevant, defendant FEDERAL EXPRESS CORPORATION also known as FedEx Corporation transacts business within the State of New Jersey and/or contracted anywhere to supply goods or services in the State of New Jersey.

3. That at all times herein relevant, defendant FEDERAL EXPRESS CORPORATION also known as FedEx Corporation committed a tortious act within the State of New Jersey.

4. That at all times herein relevant, defendant FEDERAL EXPRESS CORPORATION also known as FedEx Corporation committed a tortious act within the State of New Jersey causing injury to person or property within the State of New Jersey.

5. That at all times herein relevant, defendant FEDERAL EXPRESS CORPORATION also known as FedEx Corporation owns, leases, uses, or possesses real property situated within the State of New Jersey.

6. That by virtue of the allegations above, defendant FEDERAL EXPRESS CORPORATION also known as FedEx Corporation is subject to the laws of the State of New Jersey.

7. At all times hereinafter mentioned, plaintiff GUY EDWARD MOORE was an adult individual and was at all times herein alleged and still is a resident of Monroe County, State of Pennsylvania.

8. ABC COMPANIES 1-10 said names being fictitious are named as defendants in order to preserve the statute of limitations against unknown companies.

9. JOHN DOES 1-10 said names being fictitious are named as defendants in order to preserve the statute of limitations against unknown companies.

10. On or about December 17, 2020, plaintiff GUY MOORE was the owner and operator of a certain Subaru 2008 bearing State of Pennsylvania License Plate Number.

11. On or about December 17, 2020, defendant FEDERAL EXPRESS CORPORATION also known as FedEx Corporation was the owner of a certain Freightliner 2001 motor vehicle bearing New Jersey License Plate Number.

12. On or about December 17, 2020, defendant Jean-Paul Bennette was an employee of the defendant FEDERAL EXPRESS CORPORATION also known as FedEx Corporation.

13. On or about December 17, 2020, defendant Jean-Paul Bennett was an agent and servant of the defendant FEDERAL EXPRESS CORPORATION also known as FedEx Corporation.

14. On or about December 17, 2020, defendant Jean-Paul Bennett operated the certain Freightliner 2001 motor vehicle bearing New Jersey License Plate Number owned by the defendant FEDERAL EXPRESS CORPORATION also known as FedEx Corporation.

15. On or about December 17, 2020, defendant Jean-Paul Bennett operated the certain Freightliner 2001 motor vehicle bearing New Jersey License Plate Number with the knowledge, consent and permission of its owner defendant FEDERAL EXPRESS CORPORATION also known as FedEx Corporation.

16. On or about December 17, 2020, the vehicle owned FEDERAL EXPRESS CORPORATION also known as FedEx Corporation and operated by defendant Jean-Paul Bennette, came into contact with the vehicle operated by Plaintiff GUY MOORE on US Route 206 at or about its intersection with Oakwood Drive North, Mount Olive, New Jersey.

17. As a result of said collision GUY EDWARD MOORE was caused to be propelled forward striking his body and as a direct and proximate result of the wrongful act of the defendant, plaintiff, GUY MOORE, sustained serious injuries, which injuries necessitated his obtaining medical treatment and which caused him great pain and suffering.

18. As a direct and proximate result of the aforesaid negligence of the defendants FEDERAL EXPRESS CORPORATION also known as FedEx Corporation and Jean-Paul Bennette and said accident resulting therefrom, plaintiff GUY EDWARD MOORE was struck violently, sustained injuries causing permanent disabilities and permanent loss of bodily function, has been and in the future will be caused to obtain medical treatment for said injuries and to incur the costs thereof, has been and in the future will be disabled and not able to perform his usual functions, has been and in the future will be caused great pain and suffering and has been otherwise damaged, all to his great loss.

WHEREFORE, plaintiff, GUY MOORE, demands judgment against the defendant Jean-Paul for damages, together with interest and costs of suit.

CELLINO LAW LLP
Attorneys for Plaintiff

BY: John H. Shields (036821983)

Dated: New York, New York
April 29, 2022

JURY DEMAND

The plaintiff (s) demand a trial by a jury of six persons of all the issues of this case in accordance with R1:8-2

CELLINO LAW LLP
Attorneys for Plaintiff

BY: John H. Shields (036821983)

Dated: New York, New York
April 29, 2022

DESIGNATION OF TRIAL ATTORNEY

John H. Shields, ESQ. is designated as trial attorney.

CELLINO LAW LLP
Attorneys for Plaintiff

BY: John H. Shields (036821983)

Dated: New York, New York
April 29, 2022

DEMAND FOR INSURANCE INFORMATION

Pursuant to Rule 4:10-2(b) demand is hereby made that defendants, and each of them, disclose to plaintiff's attorney whether or not there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or indemnify or reimburse for payments made to satisfy the judgment and provide plaintiff's attorney with true copies of said agreements or policies including, but not limited to, any and all declaration sheets. This demand shall include and cover not only primary coverage but also any and all excess, catastrophe, and umbrella policies.

CELLINO LAW LLP
Attorneys for Plaintiff

BY: John H. Shields(036821983)

DEMAND FOR ANSWERS TO UNIFORM INTERROGATORIES

Plaintiffs hereby demand, pursuant to R. 4:17-(b)(ii), of the Rules of Court that the defendants serve answers to the interrogatories prescribed by Form "C" and Form "C (1)" of Appendix II of the Rules of Court within sixty (60) days of the date hereof.

CELLINO LAW LLP
Attorneys for Plaintiff

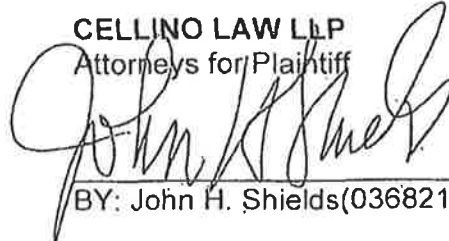
BY: John H. Shields(036821983)

Dated: New York, New York
April 29, 2022

ESX-L-002559-22 04/29/2022 4:37:56 PM Pg 7 of 7 Trans ID: LCV20221727734

CERTIFICATION

I certify the within pleading was filed within the time prescribed by the Rules of Court. There are no other actions of which I am aware that should be joined with this action, nor is the case subject of any arbitration proceeding or mediation, nor is any contemplated as of this date.

CELLINO LAW LLP
Attorneys for Plaintiff

BY: John H. Shields(036821983)

Dated: New York, New York
April 29, 2022

ESX-L-002559-22 04/29/2022 4:37:56 PM Pg 1 of 1 Trans ID: LCV20221727734

Civil Case Information Statement

Case Details: ESSEX | Civil Part Docket# L-002559-22

Case Caption: MOORE GUY VS FEDERAL EXPRESS
CORP ORATION

Case Initiation Date: 04/29/2022

Attorney Name: JOHN H SHIELDS

Firm Name: CELLINO LAW

Address: 420 LEXINGTON AVE STE 830

NEW YORK NY 10170

Phone: 8005555555

Name of Party: PLAINTIFF : MOORE, GUY, E

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same
transaction or occurrence)? NO

Are sexual abuse claims alleged by: GUY E MOORE? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the
court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

04/29/2022

Dated

/s/ JOHN H SHIELDS

Signed